

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

HEZBULLAH KAZIMI,
Plaintiff

v.

Case No.: 1:24-cv-00340-SPB

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY (“DHS”);
ALEJANDRO MAYORKAS, in his official
capacity as Secretary of DHS; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES (“USCIS”); UR MENDOZA
JADDOU, in his official capacity as
Director of USCIS; TED H. KIM, in his
official capacity as Associate Director of
the Refugee, Asylum and International
Operations Directorate at USCIS; and
RON ROSENBERG, in his official
capacity as Director of the USCIS
Arlington Asylum Office,
Defendants

**PLAINTIFF'S MOTION TO APPROVE REMOTE TRANSLATION SERVICES
AND FOR PREAPPROVAL OF COST REIMBURSEMENT**

NOW COMES the Plaintiff, Hezbollah Kazimi, by counsel, and respectfully moves this Honorable Court to Approve Remote Translation Services and to Preapprove Cost Reimbursement of the Translation Services, respectfully representing:

1. This case centers around the unexplained two-year delay of the federal government in processing Plaintiff's asylum application.
2. The Preliminary Injunction Hearing was initially scheduled for January 8, 2025. Upon Defendants' Motion to Postpone Hearing, it was continued to February 11, 2025. Plaintiff then filed a Motion to Continue Hearing. This Honorable Court, on

January 7, 2025, issued an Order scheduling the hearing on Plaintiff's Preliminary Injunction for February 7, 2025.

3. Mr. Kazimi is fluent in the Pashto and Dari languages but is still learning English and will therefore require an interpreter to provide translation services at the Injunction Hearing.

4. Counsel for Plaintiff has contacted Jawaid Samadey, a "professionally qualified" interpreter as classified by the Administrative Office of the United States Courts ("AOUSC") in the languages of Pashto and Dari.

5. Mr. Samadey has confirmed his availability for the Injunction Hearing scheduled for February 7, 2025 at 1:00 o'clock p.m. as long as he can provide his services remotely as he has prior commitments out of town and cannot be physically present at the hearing.

6. Counsel for Plaintiff has not located any other local Pashto or Dari interpreters whom the AOUSC has classified as "professional qualified."

7. Plaintiff respectfully requests this Honorable Court to permit Mr. Samadey to provide remote translation services at the Preliminary Injunction Hearing.

8. In addition, pursuant to 28 U.S.C. § 1827(g)(4), Mr. Kazimi respectfully requests that Mr. Samadey's fee be reimbursed by the Court as this matter was not instituted by the United States so the presiding Judge "shall, where possible, make such services available to that person on a cost-reimbursement basis."

9. According to the AOUSC, professionally qualified interpreters charge \$280 for a half-day of services. *See Federal Court Interpreters*, ADMIN. OFF. OF U.S.

CTS., <https://www.uscourts.gov/court-programs/federal-court-interpreters> (last visited January 7, 2025, attached hereto as Exhibit A).

10. Mr. Kazimi cannot afford the cost of the interpreter.

11. AOUSC's guidance provides that "[u]pon court order, a clerk's office may receipt the pre[payment for estimated [translation] expenses into the Deposit Fund (6855XX) and later disburse or refund funds, as appropriate, when the services end." See ADMIN. OFF. OF U.S. CTS., GUIDE TO JUDICIARY POL'Y 5 § 265. https://www.uscourts.gov/sites/default/files/guide_volo5.pdf (last visited January 8, 2025, attached hereto as Exhibit B)

WHEREFORE, Plaintiff respectfully requests that this Honorable Court grant this instant motion, authorize the use of remote translation services at the forthcoming Preliminary Injunction Hearing, and direct the Clerk to receipt the prepayment for the estimated translation expenses into the Court's deposit fund for future reimbursement.

Respectfully submitted,

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